



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

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APR 01 2013

EPA-REGION 10

Drew Gilpin
Manager Environment & Utilities
Evrz Oregon Steel (EOS)
PO Box 2760
Portland, OR 97208

Re: Evraz Oregon Steel
Groundwater Evaluation

Dear Mr. Gilpin:

Thank you for providing the *Evrz Oregon Steel 2012 Beach and Riverbank Groundwater Monitoring Report* (February 12, 2013). We have reviewed this report and agree with the conclusion that, with the exception of wells impacted by the water intake line leak, concentrations of metals in groundwater along the beach and bank of the Evraz facility are consistent with previous results and reflect generally stable or decreasing trends. Because the water line leak clearly impacted the recent results, another round of samples should be collected from wells in the vicinity of the leak (MW-9, -23, -13, -17, -10, and -18), once the groundwater table has had time to recover to natural conditions, to provide a representative data set of current concentrations.

We will proceed with finalizing our No Further Action proposal for groundwater source control at this site for EPA review. Assuming no issues are raised during that review, we will issue a No Further Action determination.

As we indicated via email, MW-22, located on Port of Portland property, can be decommissioned at this time. Once the No Further Action determination is issued, you may proceed with decommissioning other monitoring wells at the facility, other than MW-11, MW-18, and MW-19, which may be used to evaluate the performance of the stormwater treatment system.

When the additional groundwater data requested above is available, an updated report should be prepared. Please address the following clarifications in the updated report:

1. The second bullet in the section on Beach Wells states that manganese and arsenic concentrations are consistently higher in beach wells than upgradient bank wells. This is not consistent with the data for the following well pairs:

USEPA SF



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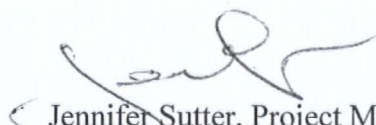
Concentration ranges in ppb

Metal/well	Bank well – MW11	Beach well – MW19	Bank wells – MW10/13	Beach wells – MW17/18	Bank well – MW8	Beach well – MW16
Manganese	290 - 29000	1420 - 2850	3.38 – 10000	188 - 1400	2260 - 5300	2450 - 3020
Arsenic	0.8 - 29	0.8 – 2.37	5.1 – 39.1	ND – 7.7	11 - 22	10.8 – 21.8

2. Any comparison to transition zone samples collected in other portions of the Portland Harbor should note that the available data was collected in the vicinity of other contaminant source areas likely to have caused elevated concentrations of metals.
3. Figures 5 and 6 do not include the most recent sampling results. Updated figures including the 2012 data, and the 2013 data, when it is available, should be prepared.
4. A figure showing the area impacted by the water intake line leak, based on groundwater elevation contours, should be prepared.

If you have any questions, please contact me at 503-229-6148.

Sincerely,


Jennifer Sutter, Project Manager
Northwest Region Cleanup Section

Cc: Linda Baker, Integral Consulting
Mark Havighorst, AECOM
Rich Muza, EPA Region 10
Henning Larsen, SRS/NWR-DEQ